



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

EC-2

970264

AUG 29 1997

Ref: 8EPR-EP

Ben Delvillar
Acting Forest Supervisor
White River National Forest
P.O. Box 948
Glenwood Springs, CO 81602

Re: Dome Peak Timber Sale, Draft
Environmental Impact Statement

Dear Mr. Delvillar:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VIII office of the Environmental Protection Agency (EPA) has reviewed the above-referenced Draft Environmental Impact Statement (DEIS). We submit the following concerns and comments for your consideration in preparation of the final EIS.

The EPA understands the proposed action is to construct roads and salvage harvest standing dead Engelmann spruce trees in the Dome Creek Timber Sale planning area. The planning area is on the Eagle Ranger District and is located in Routt County, Colorado. An estimated 3.0 million board feet of timber will be harvested from approximately 650 acres within the 1800 acre planning area. In addition, approximately one mile of new specified road and 0.5 miles of temporary road will be constructed.

Our primary concerns with the proposed action are related to water quality issues. On page 3-8, it is stated that "...one mile of new specified road construction will traverse a steep, unstable slope. There is potential for sliding and mass failure associated with this road." Discussion under Environmental Effects to riparian areas on page 3-17 states, "Sedimentation from road and stream-crossing construction may also have impacts on riparian areas. The road crosses a wetland area. The area is on a slightly steep slope." It is noted that "Approximately 10 percent of the wetland will be directly impacted and that even with road closure after the sale is completed the wetland is unlikely to recover to its current condition in the near term." If these statements refer to the same road, further discussion is needed to resolve whether the slope is "steep and unstable" or a "slightly steep slope". Irrespective of the degree of steepness, discussion related to avoidance of this area and wetland impacts is necessary. Are there other areas where the road can be constructed to avoid these wetland impacts? If not, appropriate mitigation measures to rehabilitate the wetland must be



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discussed. If the road is constructed where proposed, there needs to be a discussion of probable sedimentation during operation as well as from road construction.

We note that all new roads constructed to implement the sale are to be closed by recontouring the slopes, pulling culverts, bringing slash and rocks onto the road surface and planting grass. We recommend that elimination of road cuts be done to reduce sedimentation during spring runoff.

It is unclear whether the Forest plans to re-enter the planning area for future salvage sales. If re-entry occurs, will the new roads proposed for this project be reopened? Is there any additional consideration to close and/or obliterate some of the existing roads in the planning area?

Alternative 2, the Forest's Proposed Action will include helicopter yarding and we understand the sale duration is to be three years. It would be most helpful to a reviewer to be provided with a discussion of helicopter yarding. To meet some wildlife impact concerns the discussion should include the time frames, both months/days of the year and hours of the day, when helicopter yarding will be prohibited or limited to minimize impacts on various species. In order to make the use of helicopters economically efficient it is anticipated that their employment will be concentrated and operate continuously during daylight hours. What mitigation for noise impacts on wildlife are proposed?

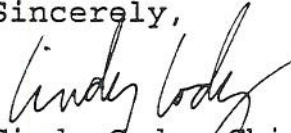
There needs to be a discussion of the potential for rotor downwash, during hovering to pick-up the cut trees, to further affect the already weakened root structure of those trees left as snags to support wildlife.

In addition, a discussion of occupancy and timing limitations related to the felling of trees and associated activities to minimize impacts to such wildlife functions as calving, nesting and fledging need to be disclosed.

Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and alternatives in an EIS, the EPA Region VIII rates this DEIS as Category EC-2. This means that additional information, as noted, would allow us to more fully assess proposed action environmental impacts. A copy of our rating criteria is attached.

The EPA appreciates the opportunity to review and comment on the DEIS. Should you have any questions, please contact Mike Hammer of my staff at (303) 312-6563.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cindy Cody".

Cindy Cody, Chief
NEPA Unit
Ecosystem Protection Program

cc: Elaine Suriano, OFA EPA-HQ
Brent Truskowski, 8EPR-EP